



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250

(360) 664-1160 • TTY (360) 586-8203

December 30, 2009

Tom Finch
CATS Manager, Western Region
PHMSA, Office of Pipeline Safety
12300 W. Dakota Avenue, Suite 110
Lakewood, Colorado 80228

Dear Mr. Finch:

Subject: CY 2008 Program Certification Audit

Thank you for your letter dated December 21, 2009, describing the results of the evaluation of the Utilities and Transportation Commission (UTC) Hazardous Liquid and Gas Pipeline Safety programs. Per your request, let me respond to each of the comments raised in your letter.

1. ***Inclusion of Damage Prevention and On-Site Operator Training in inspection procedures:***

Written procedures have been established for conducting damage prevention and on-site operator training. With respect to damage prevention, the UTC has developed and will soon be implementing an outreach program specifically targeting public organizations such as cities, counties and other public entities about their obligations under the state dig law. In addition, we intend to sponsor a series of statewide damage prevention conferences in CY2010.

2. ***Improve states review of pipeline operators or its contractor directional drilling/boring procedures.***

UTC inspection checklists were revised in July 2009 to direct the inspector's review of operator procedures to determine if appropriate actions to protect their facilities from dangers posed by drilling and other trenchless technologies have been included.

3. ***Confirm that transmission operators have submitted information into the National Pipeline Mapping System (NPMS).***

Checklist revisions made in July 2009 also included provisions to validate operators are submitting updates to the NPMS every 12 months when system modifications have occurred. When no modifications have been made, inspectors will check to ensure operators have sent the appropriate email notification stating that fact.



4. *Verify that operators continue to implement public education programs required under 49 CFR §192.616.*

Field validation of pipeline operators public awareness (PA) plans will continue to occur as part of our comprehensive standard inspections scheduled for 2010. UTC inspectors will review program documentation and materials to ensure it properly and adequately reflects implementation of operator's PA program requirements.

As always, thank you for the courteous and professional manner you demonstrated during your years representing the Pipeline and Hazardous Material Safety Administration, Western Region as State Liaison. We hope to continue working with you in your new role as CATS manager as we work together to enhance safety for the citizens of Washington.

Should you have any additional questions or concerns, please contact me at (360) 664-1219.

Sincerely,



David D. Lykken
Director, Pipeline Safety

cc: Jeff Goltz, Utilities and Transportation Commission
Chris Hoidal, PHMSA/OPS – Western Region